

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS (SHERMAN)
CASE NO 4:18-CR-95 (JUDGE MAZZANT)

UNITED STATES OF AMERICA

V

ERICK SALVADOR SUNIGA RODRIGUEZ (1)

MOTION TO TRANSFER TO MEDICAL FACILITY

COMES NOW the defendant, through undersigned counsel, and respectfully alleges and prays:

1. The defendant is currently housed at the Fannin County Detention Center in Bonham Texas.
2. The defendant was extradited from his native Guatemala on Thursday December 23, 2019.
3. The defendant voluntarily surrendered to federal authorities in Guatemala City and was transported to the United States by government aircraft.
4. The defendant has been under treatment in his native Guatemala for pancreatic cancer.

5. The undersigned first met the defendant when he was hospitalized in Guatemala and just prior to his operation to remove a cancerous lesion from his pancreas.
6. Thereafter, the defendant has undergone 6 sessions of chemotherapy in his native Guatemala just prior to his surrender and has been directed to maintain post-operative medical care as set forth in Exhibit A.
7. Such post-operative medical care is more readily available at FMC Fort Worth, a medical center administered by the Bureau of Prisons at Fort Worth Texas.
8. Relocation to such facilities from Fannin County Detention Center would still enable the defendant to attend court hearings and meet with federal agents and the undersigned on a regular basis without interruption of needed medical care.
9. The undersigned has consulted this request with AUSA Colleen Bloss who expressed no objection to the request to transfer to FMC Fort Worth.
10. The defendant will appear before the Court on Monday December 23, 2019 for his scheduled Initial Appearance, at which time the court would be in a position to take up the Motion with counsel and grant whatever relief is appropriate under the circumstances

WHEREFORE IT IS RESPECTFULLY PRAYED THE COURT GRANT THE MOTION AND ORDER THE DEFENDANT REMOVED FORTHWITH TO FMC FORT WORTH

/s/Scott Kalisch

SCOTT KALISCH

CERTIFICATE OF SERVICE

I hereby certify that I have mailed copy of this Motion to AUSA Colleen Bloss by EM/ECF electronic transfer this 21st day of December 2019

/s/Scott Kalisch

435 South Oregon Avenue, Suite 104

Tampa, Florida 33606

TEL 305 669 0808

EMAIL: scottkalisch@bellsouth.net

FLORIDA BAR #367877